

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**ENGINEERING DIVISION****APPLICATION PROCESSING AND CALCULATIONS**

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APPL. NO. 509434	DATE 04/23/10
PRCSD BY REL	CHCKD BY

Facility Name: Fabri Cote.

Equipment Location: 718 & 724 E. 60th St.
Los Angeles, CA 90001

Facility ID#: 25501

APPLICATION NO. 509800:
Title V Permit Revision

PERMIT TO CONSTRUCT(MODIFICATION)
APPLICATION NO. 509434
(PREVIOUS P/O D60923, A/N 233895)

FACILITY WIDE CONDITION(S)**Condition(s):**

1. EXCEPT FOR OPEN ABRASIVE BLASTING OPERATIONS, THE OPERATOR SHALL NOT DISCHARGE INTO THE ATMOSPHERE FROM ANY SINGLE SOURCE OF EMISSIONS WHATSOEVER ANY AIR CONTAMINANT FOR A PERIOD OR PERIODS AGGREGATING MORE THAN THREE MINUTES IN ANY ONE HOUR WHICH IS:
 - A. AS DARK OR DARKER IN SHADE AS THAT DESIGNATED NO. 1 ON THE RINGELMANN CHART, AS PUBLISHED BY THE UNITED STATES BUREAU OF MINES; OR
 - B. OF SUCH OPACITY AS TO OBSCURE AN OBSERVER'S VIEW TO A DEGREE EQUAL TO OR GREATER THAN DOES SMOKE DESCRIBED IN SUBPARAGRAPH (A) OF THIS CONDITION.
[RULE 401]
2. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS AT THIS PLANT SHALL NOT EXCEED 1,078 POUNDS IN ANY ONE DAY.
[RULE 1303(b)(2)-OFFSET]
3. MATERIAL SAFETY DATA SHEETS FOR ALL MATERIALS USED AT THIS FACILITY SHALL BE KEPT CURRENT AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.
[RULE 109, 1303(b)(2)-OFFSET]
4. THE OPERATOR SHALL KEEP ADEQUATE RECORDS TO VERIFY DAILY USAGE AND DAILY VOC EMISSIONS. SUCH RECORDS SHALL BE MAINTAINED FOR A PERIOD OF FIVE YEARS AND SHALL BE

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MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.
[RULE 109, 1303(b)(2)-OFFSET]

Equipment Description

MODIFICATION TO AN EXISTING FABRIC COATING AND CURING SYSTEM
CONSISTING OF:

1. ROLLER COATER NO. 1, WITH A 1-HP DRIVE.
2. OVEN NO. 1, ROSS 11'-6" W. X 21'-0" L. X 7'-0" H., 1,120,000 BTU PER HOUR, DIRECT, NATURAL GAS FIRED, WITH ONE 20-HP CIRCULATING FAN AND ONE 1-1/2 HP EXHAUST FAN.
3. ROLLER COATER NO. 2, WITH A 1-HP DRIVE.
4. OVEN NO. 2, ROSS, FIRST HEATING SECTION: 12'-4" W. X 34'-10" L. X 7'-0" H., 2,040,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED, WITH ONE 25-HP CIRCULATING FAN AND ONE 5-HP EXHAUST FAN; SECOND HEATING SECTION: 12'-4" W. X 29'-6" L. X 7'-0" H., 1,360,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED, WITH ONE 25-HP CIRCULATING FAN; AND COOLING SECTION: 12'-4" W. X 15'-3" L. X 7'-0" H., WITH ONE 5-HP AIR INTAKE FAN AND ONE 1-1/2 HP EXHAUST FAN.
5. PULL-THROUGH ROLL, WITH A 1-HP DRIVE.
6. TAKE-UP REEL, WITH A 1-HP DRIVE.
7. REWIND REEL, WITH A 1-HP DRIVE.
8. AFTERBURNER, 20,000,000 BTU PER HOUR, DIRECT, NATURAL GAS FIRED, WITH A 100- HP EXHAUST BLOWER VENTING ROSS AND CONSERVATHERM COATING STATIONS, COMMON TO BOTH FABRIC COATING AND CURING SYSTEMS.

BY THE REMOVAL OF;

- ONE 1,120,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED BURNER FOR OVEN NO. 1.
- ONE 2,040,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED BURNER FOR THE FIRST HEATING ZONE IN OVEN NO. 2.
- ONE 1,360,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED BURNER FOR THE SECOND HEATING ZONE IN OVEN NO. 2.

AND THE ADDITION OF;

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ONE 1,650,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED, MAXON, LN-4, LOW-NOX BURNER FOR OVEN NO. 1.

ONE 1,100,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED, MAXON, LN-4, LOW-NOX BURNER FOR THE FIRST HEATING ZONE IN OVEN NO. 2.

ONE 2,200,000 BTU PER HOUR, DIRECT NATURAL GAS FIRED, MAXON, LN-4, LOW-NOX BURNER FOR THE SECOND HEATING ZONE IN OVEN NO. 2.

Recommendation:

Permit to Construct is recommended for application number 509434 subject to the following conditions:

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. WHEN IN SOLVENT-BASED MODE, THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AN AIR POLLUTION CONTROL EQUIPMENT, WHICH IS IN FULL USE, AND HAS BEEN ISSUED AN OPERATING PERMIT BY THE EXECUTIVE OFFICER.
[RULE 1303(a)(1)-BACT]
4. THE OPERATOR SHALL KEEP ADEQUATE RECORDS TO VERIFY DAILY USAGE AND DAILY VOC EMISSIONS. SUCH RECORDS SHALL BE MAINTAINED FOR A PERIOD OF FIVE YEARS AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.
[RULE 109, 1303(b)(2)-OFFSET]
5. THE OVENS SHALL EMIT NO MORE THAN 30 PPM OF OXIDES OF NITROGEN (NO_x), AND 75 PPM CARBON MONOXIDE (CO) MEASURED BY VOLUME ON A DRY BASIS AT 3% O₂.
[Rule 1147]
6. THIS OVEN SHALL BE SOURCE TESTED UNDER FOLLOWING CONDITIONS:

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THE TEST SHALL BE CONDUCTED PURSUANT TO A SOURCE TEST PROTOCOL THAT SHALL BE SUBMITTED TO THE DISTRICT. THE PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES, INCLUDE COMPLETED DISTRICT FORMS ST-1 AND ST-2, IDENTIFY THE TESTING LAB, INCLUDE A STATEMENT FROM THE LAB CERTIFYING IT MEETS DISTRICT RULE 304(K) AND INCLUDE A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.

THE TEST SHALL BE CONDUCTED AND A WRITTEN REPORT SUBMITTED TO THE ENGINEER IDENTIFIED ON THE PERMIT TO CONSTRUCT WITHIN 60 DAYS AFTER START-UP.

THE TEST SHALL BE CONDUCTED TO DETERMINE OXIDES OF NITROGEN, CARBON MONOXIDE, OXYGEN CONTENT, MOISTURE CONTENT, FLOW RATE AND TEMPERATURE AT THE EXHAUST OF THE OVENS BY USING DISTRICT METHOD 100.1 OR OTHER APPROVED METHODS AS SPECIFIED IN RULE 1147 WHEN THE OVEN IS OPERATING AT MAXIMUM, MINIMUM, AND AVERAGE LOAD. THE SAMPLING TIME AT EACH LOAD SHALL BE AT A MINIMUM OF 15 CONSECUTIVE MINUTES.

THE DISTRICT SHALL BE NOTIFIED OF THE DATE AND TIME OF THE TEST AT LEAST 14 DAYS PRIOR TO THE TEST.

THE TEST SHALL BE CONDUCTED _BY A TESTING LAB CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR CRITERIA POLLUTANTS TO BE MEASURED AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST).

THE REPORT SHALL INCLUDE OPERATING CONDITIONS OF THE OVEN DURING THE TEST; THE FUEL FLOW RATE AT EACH LOAD, AND THE AIR TO FUEL RATIO AT EACH LOAD. THE REPORT SHALL ALSO PRESENT THE EMISSIONS DATA IN UNITS OF POUNDS PER HOUR (LB/HR) AND PARTS PER MILLION (PPM), ON A DRY BASIS AT 3% O₂.

THE TEST SHALL BE CONDUCTED USING SAMPLING FACILITIES THAT COMPLY WITH DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217.

[RULE 1147]

7. THE OPERATOR SHALL OPERATE AND MAINTAIN THE AFTERBURNER ACCORDING TO THE FOLLOWING REQUIREMENTS:

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THE COMBUSTION CHAMBER TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,400 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

THE OPERATOR SHALL OPERATE AND MAINTAIN A TEMPERATURE MEASURING AND RECORDING SYSTEM TO CONTINUOUSLY MEASURE AND RECORD THE COMBUSTION CHAMBER TEMPERATURE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A COMBUSTION CHAMBER TEMPERATURE OF LESS THAN 1,400 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION OF THE EQUIPMENT IT SERVES. THE OPERATOR SHALL REVIEW THE RECORDS OF THE COMBUSTION CHAMBER TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

WHENEVER A DEVIATION OCCURS, THE OPERATOR SHALL INSPECT THIS EQUIPMENT TO IDENTIFY THE CAUSE OF SUCH A DEVIATION, TAKE IMMEDIATE CORRECTIVE ACTION TO MAINTAIN THE COMBUSTION CHAMBER TEMPERATURE AT OR ABOVE 1,400 DEGREES FAHRENHEIT, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE REPORT SHALL INCLUDE THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS

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PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[RULE 1303(a)(1)-BACT, RULE 3004(a)(4)-PERIODIC MONITORING, 40CFR PART 64]

Periodic Monitoring:

8. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:
 - A. THE TEST SHALL BE CONDUCTED NO LATER THAN JUNE 18, 2010 UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
 - B. THE TEST SHALL BE CONDUCTED TO DETERMINE THE VOC EMISSIONS USING AN APPROVED DISTRICT METHOD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE PERMIT CONDITION(S), RULES AND REGULATIONS.
 - C. THE SOURCE TEST SHALL BE CONDUCTED WHILE THE AFTERBURNER IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT MAY BE INCREASED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.
 - D. THE OPERATOR SHALL COMPLY WITH ADMINISTRATIVE CONDITIONS NOS. 8, 9, AND 10 OF SECTION E OF THIS FACILITY PERMIT.
 - E. THE OPERATOR SHALL SUBMIT TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SPECIFIED IN CONDITION NO. 9 OF SECTION E OF THIS FACILITY PERMIT TO THE DISTRICT ENGINEERING AND COMPLIANCE DIVISION. THE ENGINEERING COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, COATING, PRINTING AND AEROSPACE OPERATIONS, ATTN: AIR QAULTY AND COMPLIANCE SUPERVISOR, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765. THE COMPLIANCE COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, P.O. BOX 4941, DIAMOND BAR, CA 91765

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[RULE 3004(a)(4)]

Emissions and Requirements:

9. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109
VOC: RULE 1128, SEE APPENDIX B FOR EMISSION LIMITS
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
PM: 0.1GR/SCF, RULE 409
CO: 2000 PPMV, RULE 407
HAP(S): 40 CFR63 SUBPART JJJJ, SEE SECTION J FOR REQUIREMENTS

Background

Fabri-Cote is in the business of manufacturing rubber impregnated fabrics. They submitted this application, 509434, on 3/30/2010 as a modification to existing ovens with a previous permit, p/o D60923, a/n 233895. The modification will replace the existing three natural gas fired burners with a new Maxon low-nox burners. The total burner capacity will increase by 430,000 btu per hour. The burners are expected to meet 1147 requirements.

The facility has been in constant operation with a Title V permit since 2001. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints or Notices to Comply issued in the last two years. However, the facility was issued a Notice of Violation on 8/21/2008 for failure to submit their semi-annual monitoring reports and annual compliance reports for year 2007. The facility is currently operating in compliance with all applicable rules and permit conditions.

Emissions CalculationsOven:

Combustion emissions:

1,120,000 BTU PER HOUR OVEN NO. 1.

2,040,000 BTU PER HOUR FIRST HEATING ZONE IN OVEN NO. 2.

1,360,000 BTU PER HOUR, SECOND HEATING ZONE IN OVEN NO. 2.

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Modified with LOW-NOX burners

1,650,000 BTU PER HOUR FOR OVEN NO. 1.

1,100,000 BTU PER HOUR FIRST HEATING ZONE IN OVEN NO. 2.

2,200,000 BTU PER HOUR SECOND HEATING ZONE IN OVEN NO. 2.

Delta Increase in burner Capacity

4.95 mmbtu/hr – 4.52 mmbtu/hr = 0.430 mmbtu/hr

24hrs/day, 4 days/week, 48 weeks/yr

Previous Emissions:

4.52 mmbtu/hr

	ROG	NOx	SOx	CO	PM10
Emission Factor	7.0	130.0	0.83	35	7.6
Gas Usage					
4.3048 x 10 ⁻³ mmcuff/hr					
lb/hr	3.01E-02	0.5596	3.573E-3	0.15	3.272E-02
lb/day	0.723	13.43	0.0857	3.61	0.785

New burner

4.95 mmbtu/hr

	ROG	NOx	SOx	CO	PM10
Emission Factor	7.0	38.3	0.83	59.4	7.6
Gas Usage					
4.714 x 10 ⁻³ mmcuff/hr					
lb/hr	3.30E-02	0.1806	3.913E-3	0.28	3.441E-02
lb/day	0.792	4.333	9.391E-2	6.7	0.8259

Net Change in Emissions:

	ROG	NOx	SOx	CO	PM10
lb/hr	+0.003	-0.1011	+3.4E-4	+0.13	+1.69E-03
lb/day	+0.07	-2.426	+8.16E-3	+3.09	+0.041

Risk Assessment:

The modification to the oven burners will cause a net increase in the total burner rating of 430,000 btu per hour. The Tier 1 screening was conducted and passed with the following values:

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Cancer/chronic ASI

2.16E-01

Passed

Acute ASI

1.18E-02

Passed

Evaluation & Rule Review

Rule 212 (c)(1):This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school.

A public notice is not required since a school is not located within 1,000 ft from the above site.

Rule 212 (c)(2):This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The proposed project will result in a combustion emission decrease for NO_x and an increase for the other combustion contaminants. A Rule 212(c) (2) notice will not be triggered since the emissions do not exceed the daily maximum specified in Rule 212(g).

Rule 212(c)(3):This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project will result in an emission increase that will trigger an HIC or HIA screening. The changes passed Tier 1 screening as follows:

Cancer/chronic ASI

Acute ASI

2.16E-01

1.18E-02

Passed

Passed

Public notice is not required under this section of the rule.

Rule 212(g):This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The emission increase due to the modification of this equipment will not be in excess of the daily maximum as specified in Rule 212(g) and the following summarizes the emission increase:

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	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	-2	0	0	+3	0
MAX Limit (lb/day)	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

A public notice is not required since the emission increase is below the thresholds.

Rule 401: With proper operation and maintenance, compliance with this rule is expected.

Rule 402: With proper operation and maintenance, compliance with this rule is expected.

Rule 1128: This facility uses an afterburner to comply with the requirements of this rule under section (d) approve emission control system. Compliance with the requirements of this rule is expected.

Rule 1147: The applicant is proposing to install a low-Nox burner in the existing ovens capable of meeting the requirements of this rule. Compliance will be demonstrated by source testing. Compliance is expected.

REG XIII: New Source Review.

1303(b) The applicant is proposing to install low-NOx burners capable of meeting 30 ppm NOx and 75 ppm CO. The modification to the ovens by replacing the burners to meet the requirements of rule 1147 will result in NOx emission reduction due to the installation of the low-NOx burners.

In addition, the proposed modification will result in an emission increase in other criteria pollutant due to the increase in the burner ratings (increase of 0.43 MMbtu/hr). The proposed modification will result in an increase of 3.09 lbs/day of CO emissions. However, since CO is an attainment air contaminant, emission offsets will not be required. Further, as demonstrated in the emissions calculations, the net increase in ROG, SOx, and PM10 emissions will be less than 0.5 pound per day, and as a result will not trigger NSR requirements.

Rule 1401: Toxics:

The modification to this existing coating line will cause an increase in combustion contaminants with the increased burner capacity. The net increase will pass the Tier One screening with the following results:

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Cancer/chronic ASI

2.16E-01

Passed

Acute ASI

1.18E-02

Passed

REGULATION XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a "de minimis significant permit revision" to the Title V permit for this facility.

Rule 3000(b)(6) defines a "de minimis significant permit revision" as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NOx	40
PM10	30
SOx	60
CO	220

To determine if a project is considered as a "de minimis significant permit revision" for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V permit shall be accumulated and compared to the above threshold levels. This proposed project is the 1st permit revision to the Title V permit renewal issued to this facility on June 18, 2006. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V permit renewal was issued:

Revision	HAP	VOC	NOx	PM ₁₀	Sox	CO
1 st Permit Revision; Modification to the existing ROSS coating line by replacing the oven burners with LOW-	0	0	-2	0	0	+3

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NOx burners for Rule 1147 compliance						
Cumulative Total	0	0	-2	0	0	+3
Maximum Daily	30	30	40	30	60	220

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a "de minimis significant permit revision".

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "de minimis significant permit revision" it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.